

YERGEY•DAYLOR•ALLEBACH•SCHEFFEY•PICARDI

By: Gregory W. Philips, Esquire

ID # 87132

1129 High Street, P.O. Box 776

Pottstown, PA 19464-0776

610-323-1400

610-323-4660 (f)

Attorney for Debtor(s)

**UNITED STATES COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: RONALD L. MOYER,

: Case No. 17-11621-amc

:

Debtor(s) : Chapter 7

**AMENDED APPLICATION FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Gregory W. Philips, Esquire, Attorney for the Debtor, Ronald L. Moyer applies under § 330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. Applicant is counsel for the debtor.
2. The debtor filed a petition under chapter 13 of the Bankruptcy Code on March 8, 2017.
3. The debtor's annualized current monthly income as set forth on Form 122C-1 is below the median (the amount on line 15 is less than the amount on line 16).
4. On May 11, 2017, after consultation with counsel and his family, Debtor filed a motion to convert the case under Chapter 13 to a case under Chapter 7 of the Bankruptcy Code. This Honorable Court converted the case to a case under Chapter 7 and the matter was originally listed as a no asset case.
5. On May 18, 2017, Debtor amended his voluntary Petition to change the case from a no asset case to an Asset case; amended his Schedule C Exemptions and proposed to sell his

the mixed use commercial/residential real estate that he currently uses as his residence minus his federal exemptions.

6. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.

7. Applicant requests an award of compensation of \$4,000.00 for 27 hours expended on the initial consultation with client(s) and in providing before confirmation (i) the customary services of counseling and representing the chapter 13 debtor(s) in connection with the analysis of the financial situation; preparation, review and filing with the court of all required documents; correspondence, telephone conversations and miscellaneous contact with creditors, the trustee, attorneys and other parties in interest; preparation for and attendance at 341(a) meeting, and (ii) in representing the debtor(s) in conversion of this case from a case under Chapter 13 of the U.S. Bankruptcy Code to a case under Chapter 7; preparation of amended schedules; correspondence with the Chapter 7 Trustee; upload of documents; and attendance at the Chapter 7 341 Meeting of Creditors.

8. Applicant, whose hourly rate is \$250.00 per hour, requests compensation be awarded in the amount of \$4,000.00 for the work specified above

9. Applicant requests reimbursement of expenses in the amount of \$335 for the following expenses:

- a. Filing Fee for Debtors' Chapter 13 Voluntary Petition.
- b. Filing Fee for the Motion to convert Debtors Case to a Chapter 7.

10. The debtor(s) has paid Applicant \$310.00 to cover the cost of the filing fee prior to the filing of the Chapter 13 petition. Debtor has not paid any of the original Attorney's fees requested but intended to pay the Attorney's fees through the Chapter 13 plan. The conversion to a case under Chapter 7 has required the expenditure of additional time on Debtor's behalf.

11. A copy of the Applicant's Chapter 13 disclosure of compensation pursuant to Fed. R. Bankr. P. 2016(b) is attached hereto as Exhibit "A."

12. A copy of Applicant's Disclosure of compensation, amended after the conversion of the case to a case under Chapter 7 is attached hereto as Exhibit "B".

13. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C. §504(c) applies.

14. Attached as Exhibit "C" is a copy of Applicant's time records setting forth the dates and amount of time expended for the services performed on behalf of the debtor(s).

WHEREFORE, Applicant requests an award of total compensation \$4,000.00 and of \$335.00 in reimbursement of actual, necessary expenses less the \$310.00 paid by Debtor to pay the Chapter 13 Filing Fee pre-Petition.

6/30/2017

\s\ Gregory W. Philips

Date:

Gregory W. Philips, Esquire
Attorney for Debtors
1129 E. High Street, P.O Box 776
Pottstown, PA 19464-0776
610-323-1400